

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

In re:	*	Case No. 13-52954
<u>Randall D LeuVoy</u>		
Angela L LeuVoy	*	CH13
Debtor	*	Judge: PRESTON

MOTION TO SUSPEND CHAPTER 13 PLAN PAYMENTS

Now comes Debtor, by and through counsel, and moves the Court for a suspension of Chapter 13 Plan payments, due to a change of employment that will leave a gap in thier income. In support of this motion, Debtors represent to the Court that:

1. Debtors petitioned for relief on April 15, 2013 and the proposed Chapter 13 Plan was confirmed on December 27, 2013, as a “Pot Plan” with an estimated dividend to unsecured creditors of 15.7% and a monthly payment of \$1,961.00.
2. The Plan has not been previously modified.
3. Debtors are currently in month 38 of their plan.
4. Since the time of filing, Debtor Randal D LeuVoy has lost his job with Fortis College.
5. Although Debtor does receive temporary unemployment income and Joint Debtor is still employed, they cannot maintain their current plan payments while maintaining regular living expenses until Mr. LeuVoy Returns to work.
6. Debtors do not have any current disposable income at this time as evidenced by the attached schedules I and J.
7. There are no secured or priority claims left to be paid in this case and no set monthly payments to any creditors to be made by the Trustee.
8. As of the time of this motion, the trustee has paid between 1.86% to 2.85% to unsecured creditors’ claims.
9. Debtors estimate that Mr. LeuVoy will return to work within 6 months.
10. Debtors propose to suspend plan payment for six months, beginning with the month of June 2016 and continuing until December 2016.

11. Debtors further propose modifying their plan once Mr. LeuVoy returns to work to ensure that the case will complete in the 60th month.

WHEREFORE, Debtors pray for an order suspending their Chapter 13 Plan payments for six months beginning with June 2016.

Respectfully submitted,

/s/ Michael A. Cox
Michael A. Cox (0075218)
Guerrieri, Cox & Associates
2500 N. High St., Ste 100
Columbus, OH 43202
(614) 267-2871
Fax to (614) 267-2873
Attorney for the debtor.

NOTICE OF MOTION TO SUSPEND CHAPTER 13 PLAN PAYMENTS

The above debtor has filed a motion to temporarily suspend her Chapter 13 Plan payments.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (if you do not, you may wish to consult one.)

If you do not want the court to consider the Motion to Suspend Plan Payments you or your attorney must file with the Court a written response memorandum within **21 days** of Friday, June 03, 2016, the date of service at:

United States Bankruptcy Court
170 N. High Street
Columbus, OH 43215

If you mail your response to the court for filing, you must mail it early enough so the Court will receive it on or before the date stated above.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Motion to Suspend Chapter 13 Plan Payments was served upon the following parties in interest on **June 3, 2016** as indicated below.

Served electronically via the Court's ECF System at the address registered with the Court:

Asst. U.S. Trustee
Frank M. Pees
Brian M Gianangeli

Parties in interest served via U.S. Mail:

All parties in interest on the attached matrix.

Randall & Angela LeuVoy
1319 Graf St.
Lancaster, OH 43130

/s/ Michael A. Cox
Michael A. Cox (0075218)

Label Matrix for local noticing
0648-2
Case 2:13-bk-52954
Southern District of Ohio
Columbus
Fri Jun 3 12:04:57 EDT 2016

ACE Cash Express
Corporate Office
1231 Greenway Drive, Suite 600
Irving, TX 75038-2511

AEP
Attn: Bankruptcy
1 AEP Way
Hurricane, WV 25526-1231

AEP
PO Box 2021
Attention Bankruptcy
Roanoke, VA 24022-2121

AT&T Bankruptcy Department
P.O. Box 769
Arlington, TX 76004-0769

Aaron's
1418 Ety Pointe Dr. NW
Lancaster, OH 43130-7764

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2800 Canton Road Suite 900
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American Health Network
4074 Gantz Rd.
Grove City, OH 43123-4816

American InfoSource LP as agent for
Apria Healthcare
PO Box 248838
Oklahoma City OK 731248838

American InfoSource LP as agent for
Midland Funding LLC
PO Box 268941
Oklahoma City OK 73126-8941

American InfoSource LP as agent for
Verizon
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Oklahoma City OK 731248838

Apria Healthcare
P.O. Box 631654
Cincinnati, OH 45263-1654

Asset Acceptance Corp.
PO Box 2036
Warren, MI 48090-2036

Asst US Trustee (Col)
Office of the US Trustee
170 North High Street
Suite 200
Columbus, OH 43215-2417

Bariatric Specialists of Ohio
Department 77826
P.O. Box 7700
Detroit, MI 48277-0001

(c)BUCKEYE LENDING SOLUTIONS
6785 BOBCAT WAY STE 200
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CBCS
170 E. Town Street
PO Box 18838
Columbus, OH 43215-4608

CBCS
PO Box 163279
Columbus, OH 43216-3279

Cardiology Inc.
5975 East Broad St., Suite 305
Columbus, OH 43213-1531

Cardiovascular Specialist LLC
PO Box 576
Lancaster, OH 43130-0576

Cascade Capital, LLC
Recovery Management Systems Corp.
25 SE 2nd Avenue Suite 1120
Miami, FL 33131-1605

Central Portfolio Control Inc
6640 Shady Oak Rd #300
Eden Prairie, MN 55344-7710

Check N Go
7755 Montgomery Road
Cincinnati, OH 45236-4197

Children's Radiologic Institute, Inc.
700 Childrens Drive
Columbus, OH 43205-2664

Childrens Surgical Associates
PO Box 715230
Columbus, OH 43271-5230

Columbus Radiology Corp
P.O. Box 7169
Columbus, OH 43205-0169

Computer Collections Inc
Claim Dept 071120 640 West 4th St
PO Box 5238
Winston Salem, NC 27113-5238

Continental Bank

620 W. Germantown Pike

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Plymouth Meeting, PA 19462-2219

Convergent Outsourcing

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Houston, TX 77043-2317

County Recorder

Fairfield County

Lancaster, OH 43130

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Columbus, OH 43202-2988

Credit Collection Services

PO Box 9134

Needham Heights, MA 02494-9134

Credit Solutions

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Lexington, KY 40524-4710

Credit Solutions LLC

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3 Easton Oval STE 210

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Dayton, OH 45429-1221

Department of the Treasury

Internal Revenue Service

P.O. Box 7346

Philadelphia, PA 19101-7346

Diley Ridge Medical Center

PO Box 89415

Cleveland, OH 44101-6415

(p)DIRECTV LLC

ATTN BANKRUPTCIES

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GREENWOOD VILLAGE CO 80155-6550

Diversified

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Jacksonville, FL 32255-1268

Enhanced Recovery Corp

8014 Bayberry Road

Jacksonville, FL 32256-7412

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Thomas & Thomas

2323 Park Ave.

Cincinnati, OH 45206-2788

Fairfield Emergency Physicians

PO Box 309

Akron, OH 44309-0309

Fairfield Medical Center

1153 East Main St.

Lancaster, OH 43130-4056

(p)CHOICE RECOVERY INC

1550 OLD HENDERSON ROAD

STE 100

COLUMBUS OH 43220-3662

First Bank of Delaware

PO Box 101781

Fort Worth, TX 76185-1781

First Credit

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Fairlawn, OH 44334-8683

Firstsource Advantage

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Buffalo, NY 14228-3609

Florida Infusion Services, Inc.

1053 Progress Court

Palm Harbor, FL 34683-1448

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Heath Harner

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IC Systems

PO Box 2621

Sioux Falls, SD 57101-2621

Internal Revenue Service
Centralized Insolvency Operations
PO Box 7346
Philadelphia, PA 19101-7346

JP Recovery Services
P.O. Box 16749
Rocky River, OH 44116-0749

JPMorgan Chase Bank NA
PO Box 15145
Wilmington, DE 19850-5145

(p)JEFFERSON CAPITAL SYSTEMS LLC
PO BOX 7999
SAINT CLOUD MN 56302-7999

Jostens Inc
C/o Cybr Collect
3 Easton Oval Ste 210
Columbus, OH 43219-6011

Kaplan College
College for Professional Studies
6409 Congress Ave.
Boca Raton, FL 33487-2853

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Lancaster, OH 43130-0819

Legacy Visa
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Sioux Falls, SD 57117-5097

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Randall Don LeuVoy
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Midland Funding
8875 Aero Drive
San Diego, CA 92123-2255

Mt Carmel Health
Corporate Service Center
Customer Service 2nd Floor
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Columbus OH 43213-1574

National Recovery Systems, Inc.
P.O. Box 1128
Dublin, OH 43017-6128

Nationwide Children's Hospital
Collection Department
700 Children's Drive
Columbus, OH 43205-2664

OSU Physicians
PO Box 740727
Cincinnati, OH 45274-0727

Office Mart Inc.
1151 E. Main St.
Lancaster, OH 43130-4056

Office of the Attorney General
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Columbus, OH 43216-5009

Ohio Attorney General
Collections Enforcement, Attn:Bankruptcy
150 E. Gay St., 21st Floor
Columbus, OH 43215-3191

Ohio Department of Taxation
Bankruptcy Division
P.O. Box 530
Columbus, OH 43216-0530

Ohio Dept of Job & Family Services
Litigation Unit - Unemp Comp
PO Box 182404
Columbus, OH 43218-2404

Ohio Orthopaedic Center
2405 N. Columbus Street #120
Lancaster, OH 43130-8189

Ohio State Department of Taxation
Attn: Bankruptcy Division
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Columbus, OH 43216-0530

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Pediatric Academic Assoc.
Dept. L289
Columbus, OH 43260-0001

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Premier Cleaning Systems Inc.
PO Box 37156
Cincinnati, OH 45222-0156

Progressive Insurance
Highfield Insurance
623-I Park Meadow Rd.
Westerville, OH 43081-2876

Publishers Clearing House
P.O. Box 400491
Des Moines, IA 50340

Quantum3 Group LLC as agent for
ACE Cash Express INC
PO Box 788
Kirkland, WA 98083-0788

Radiology Inc
PO Box 182504
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Recovery Management Systems Corporation
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Miami, FL 33131-1605

Rent-A-Center
1255 N. Memorial Dr.
Lancaster, OH 43130-1626

Sanbar LLC
C/O Barker Management
148 W. Fair Ave.
Lancaster, OH 43130-1806

Santander Consumer USA
PO Box 961245
Fort Worth TX 76161-0244

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Ft Worth, TX 76161-0244

Seventh Avenue
c/o Creditors Bankruptcy Service
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Dallas, TX 75374-0933

Sprint
Bankruptcy Department
6391 Sprint Pkwy
Shawnee Mission, KS 66251-2800

(p)SPRINT NEXTEL CORRESPONDENCE
ATTN BANKRUPTCY DEPT
PO BOX 7949
OVERLAND PARK KS 66207-0949

State Collection Service Inc.
PO Box 6250
Madison, WI 53716-0250

State of Ohio
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Columbus, OH 43215-3430

State of Ohio
Charles Misfud, Speacial Counsel
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(p)C O AMERICAN INFOSOURCE LP
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OKLAHOMA CITY OK 73118-7901

TEBO Financial Services
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Massillon, OH 44646-7973

TEBO Financial Services, Inc.
4801 Dressler Rd. NW
Suite #194
Canton, Ohio 44718-3669

The Swiss Colony
P.O. Box 2814
Monroe, WI 53566-8014

The Swiss Colony
c/o Creditors Bankruptcy Service
P.O. Box 740933
Dallas, TX 75374-0933

Time Warner Cable
Bankruptcy Department
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Charlotte, NC 28201-1327

Tribute
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Newark, NJ 07101-0136

Trust Company Bank
1 Park Place N.E.
Atlanta, GA 30303-2904

U S Dept Of Ed/fisl/at
Attn: Bankruptcy
61 Forsythe St Room 19t89
Atlanta, GA 30303-8928

U S Dept Of Ed/fisl/ch
Bankruptcy Unit
Po Box 65128
Saint Paul, MN 55165

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Columbus, OH 43215-2326

US Department of Education
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St Paul MN 55116-0448

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Toledo, OH 43614-1501

Verizon Wireless
Bankruptcy Group
PO Box 3397
Bloomington, IL 61702-3397

Zip 19
200-15225 104 Ave
Surrey, B.C. V3R 6Y8 Canada

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Direct TV
P.O. Box 6414
Carol Stream, IL 60197-6414

Ffcc-columbus Inc
1550 Old Hederson Road St.
Columbus, OH 43220

Jefferson Capital Systems LLC
PO BOX 7999
SAINT CLOUD MN 56302-9617

Sprint Nextel
Attn Bankruptcy Dept
PO Box 7949
Overland Park KS 66207-0949

T Mobile
P.O. Box 742596
Cincinnati, OH 45274-2596

Addresses marked (c) above for the following entity/entities were corrected
as required by the USPS Locatable Address Conversion System (LACS).

Buckeye Lending Solutions
7001 Post Rd.
Suite 200
Dublin, OH 43016

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)Net Pay Day Loans	(u)Ohio Department of Taxation	End of Label Matrix	
		Mailable recipients	124
		Bypassed recipients	2
		Total	126